

APPROVED

by Order of Rosatom South Asia
Marketing (India) Private Limited
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POLICY FOR PROCESSING OF PERSONAL DATA IN

Rosatom South Asia Marketing (India) Private Limited

**POLICY FOR PROCESSING OF PERSONAL DATA IN ROSATOM
SOUTH ASIA MARKETING (INDIA) PRIVATE LIMITED**

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1. Purpose and Scope:

- (i) A Policy for Processing of Personal Data in the Foreign Regional Centers of the State Corporation Rosatom - Rosatom South Asia Marketing (India) Private Limited (hereinafter referred to as the “Policy”) defines the purpose, objects, basic principles, goals, conditions, methods and ethics for Processing of Personal Data, lists of Subjects and Personal Data processed in Rosatom (hereinafter referred to as “RC”), RC options for Processing of Personal Data, the rights of Personal Data Subjects, as well as the requirements for Personal Data protection implemented in the RC.
- (ii) Being a professionally managed State Corporation, RC is committed to international compliance with Data Protection Laws & Policies. The Policy applies to India as well as worldwide to various branches of RC as well as its associated Corporations, and is in harmony with globally accepted, basic principles and policies on Data Processing, ethical utilization as well as its protection etc. Ensuring Data Protection is the foundation of trustworthy business relationships and the reputation of RC as an ethically & professionally managed Corporation.
- (iii) While the Policy provides the basis for the development of Local Regulations governing the Processing of Personal Data of RC employees as well as Personal Data of other Subjects; it also provides one of the necessary framework conditions for Cross-Border Data Transmission among the Corporate Associates of RC. It ensures high standard of Data Processing with proper purpose to achieve, management as well as protection of Data etc. in tune with various national laws, in force as well as those being sought to be legislated, including the pronouncement of Right to Privacy to be a Fundamental Right by Supreme Court of India, similarly the ‘European Union Data Protection Directive’ acknowledging the same and prescribing ‘General Data Protection Regulation’, as well as laws of various other nations for Cross-Border Data Transmission. The proper implementation of the present Policy would also act as safeguard to RC against any actual, whether intended or unintended Personal Data Breach, false claims or allegations in future regarding any Personal Data Breach.

2. Terms and Definitions:

Data: means and includes a representation of any or all types of information as well as facts, concepts, opinions, or instructions in a manner or mode suitable for storing in records, putting in communication, interpretation, or Processing by humans or by automated means as well as capable of being transferred;

Biometric Data: means all or any of the physical data including facial images, fingerprints, iris scans, foot prints, or any other similar personal data resulting from measurements or technical recording, Processing operations carried out on physical,

physiological, or behavioral characteristics of a data principal (person), which allow or confirm the unique identification of that natural person;

Genetic Data: means Personal Data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology, health or behavioral characteristics of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

Health Data: means Personal Data related to the state of physical or mental health of the Data Principal or Data Subject and includes records regarding the past, present or future state of the health of such Data Principal, and so also the Data collected in the course of registration for, or provision of health services, Data associating the Data Principal to the provision of specific health services;

Financial Data: means any number/s or figure/s or other personal data used to identify account/s opened by, or Cards or payment Instrument issued by any financial institution/s to a Data Principal or any Personal Data regarding the relationship between a financial institution and a Data Principal, including financial status and credit history;

Personal Data: means any or all types of information or Data, including Biometric Data, Genetic Data, Health Data, Financial Data etc. about or relating to a natural person who is directly or indirectly identifiable, having regard to any identification marks, qualifications, records, characteristic, trait, attribute or any other feature of the identity of such natural person, or any combination of such features, or any combination of such features with any other information;

Automated means: means and include, through any Computer or Engineering Device or equipment or gadget or Software capable of operating automatically and / or electronically or digitally in accordance with the program designed and set, in response to instructions given for the purpose of Processing, storage, classification, transfer, deletion etc. of the Data;

Processing of Personal Data: means and includes any action or operation or set of operations performed on Personal Data either manually or through Automated means, and may include operations such as extraction, collection, recording, sorting out, classification, systematization, accumulation, storage, refinement (including updating & changing or doing correction), using, transferring, organizing, structuring, storing, adaptation, alteration, retrieval, alignment or combination, indexing, disclosure by transmission, depersonalization, truncation, blocking, dissemination or otherwise making available, restriction, and so also deletion, erasure or destruction thereof;

Person: means an individual, a firm, a Company, an association of persons or a body of individuals, whether incorporated / registered or not, a Hindu Undivided Family (HUF) in India, the State and also every other artificial juridical person, not falling within any of the preceding terms;

Profiling: means any form of actions, operations or Processing of Personal Data that

analyses or predicts and depicts required aspects concerning the behaviour, attributes or interest of a Data Principal;

Natural Person: means every living person or individual of whatever sex, and also includes the persons who may have expired;

Personal Data Subject or Data Principal: means any Person, whether natural or otherwise, whose Personal Data is Processed by RC or is, to be taken or proposed or being considered to be taken for Processing by RC;

Data Fiduciary: means RC or any other person, including the State Operator, or Company or any juristic entity or any individual, with whom the RC associates or to whom RC delegates, who alone or in conjunction with others determines the purpose and means of Processing of Personal Data;

Information: means any Information including records, messages, Data etc. regardless of form of their presentation;

Personal Data Information system: means set of Personal Data contained in Databases and Processing technologies and technical means performing & facilitating their Processing;

Operator or Personal Data Operator: means RC or any State body, Municipal Body or any other Governmental Body, legal or natural person, with whom the RC associates or to whom RC delegates, which independently or alongwith other person/s, organizes and / or does Processing of Personal Data, as well as determines the purposes of Processing of Personal Data, the composition of Personal Data to be processed, actions as well as operations to be performed with Personal Data;

Provision of Personal Data: means actions or operations aimed at disclosing Personal Data to a specific person or a certain group of persons;

Cross-Border Transfer of Personal Data: means Transfer of Personal Data by whatever means to the territory of a different or foreign State;

Blocking of Personal Data: means temporary cessation of Processing of Personal Data, but doesn't include the acts or operations of Processing which is necessary to clarify or identify Personal Data;

De-Personalization or De-Identification of Personal Data: means any actions, operations or Process by means of which a Data Fiduciary or Data Processor may remove, or mask identifiers from Personal Data, or replace them with such other fictitious name or code that is unique to an individual but does not, on its own, directly identify the Data Principal; and as a result of which it becomes impossible, without using additional information, to determine the ownership of Personal Data to a Data Principal or specific Personal Data Subject;

Re-Personalization or Re-Identification of Personal Data: means any actions, operations or Process by which a Data Fiduciary or Data Processor may reverse the process of De-Personalization or de-Identification;

Destruction of Personal Data: means any actions, operations or Process by means of which a Data Fiduciary or Data Processor may permanently remove or delete the Personal Data, as a result of which it becomes impossible to restore the contents of Personal Data in the Information System of Personal Data and / or as a result of which the material carriers of Personal Data are deleted or destroyed;

Sensitive Personal Data: means Personal Data revealing or related to or constituting, as Biometric Data, Genetic Data, Health Data, Financial Data, Passwords, Official Identifier, Personal Identification Marks, Sex Life, Sexual Orientation, Transgender status, Intersex Status, Caste or Tribe, Religious or Political beliefs and affiliations etc. or any other category of Data which clearly appears to be of sensitive nature;

Personal Data breach: means any unauthorized or accidental revelation, disclosure, acquisition, sharing, use, pilferage, copying, alteration, destruction, loss of access to, of Personal Data that compromises the confidentiality, integrity or availability of Personal Data to a Data Principal;

All other terms shall construe the same meaning as assigned to them in the normal course or under the respective Laws or Acts, which deal with them, as the case may be.

3. Rosatom Corporation, the Data Operator:

RC itself being an Operator of Personal Data, shall process Personal Data of all Data Principals including the RC Executives, employees as well as other Personal Data Principals or Data Subjects who are connected with and also interacting & transacting with RC, rendering services to RC, though not in an employment relationship with RC, in accordance with the provisions of the present Policy.

4. Professionalism & Transparency:

RC shall, in capacity of Personal Data Operator, maintain a high standard of professionalism and absolute transparency while Processing of Personal Data of all Personal Data Subjects and shall from time to time take all Personal Data Subjects into confidence before or while Processing of their Personal Data, or carrying out any further or additional operations by providing them all the required information to their satisfaction.

5. Objectives & Purposes for Processing of Personal Data:

RC shall Process the Personal Data only for the purpose of meeting its professional requirements, promoting as well as facilitating efficiency during operations, and *inter alia* doing other related or synonymous acts, viz. -

- (a) Maintaining records of the various Personal Data Subjects as referred above i.e. Executives, employees, workers of RC and so also other persons associated with as well as interacting and/or transacting with or

- rendering services to RC, in order to facilitate communication, interaction and transaction with them, coordinate with them, and establish even a systematic coordination *inter se* and get works of Rosatom executed in the most efficient as well as effective manner;
- (b) Maintaining records of the various Personal Data Subjects as referred above, in order to understand, do research and plan, coordinate, program and execute the works of Rosatom by making optimum and best possible utilization of qualifications, abilities, experience, skills, talents etc. of the Personal Data Subjects;
 - (c) To endeavor, ensure and achieve maximum speed as well as smoothness, efficiency and effectiveness in performance of and getting all professional and operational works of RC executed, including optimum utilization of efforts and services of all Personal Data Subjects as well as making the due payments, remunerations, reimbursements, incentives etc. to them or collect, recover payments due from them, as the case may be.
 - (d) To develop and facilitate maintenance of healthy coordination and relations between the management of RC and Personal Data Subjects, take steps and work for welfare of all, develop and maintain public relations, in accordance with the various schemes & policies of Rosatom from time to time, towards achievement of its professional objectives etc.;
 - (e) Ensure compliance with policies, provisions or enactments of Legislatures and/or other Regulatory Bodies of the RC *Registration Country*, Local Regulations of the State Corporation Rosatom and RC;
 - (f) Implementation of functions, powers and responsibilities stipulated or assigned by the Legislation of the RC *Registration Country* to RC, including the provision of Personal Data to State authorities, the *Pension Fund, the Social Insurance Fund, the Federal Medical Insurance Fund*, as well as other State bodies;
 - (g) Regulation and maintenance of Labor relations with RC employees and workers, providing them employment assistance, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of life as well as property;
 - (h) Make provision for additional guarantees and compensations to employees of RC and members of their families, including non-State pension coverage, voluntary medical insurance, medical care and other types of social security;
 - (i) Protection of life, health or other vital interests of Personal Data Subjects;
 - (j) Preparation, facilitation, execution, conclusion and termination of contracts with counterparties;
 - (k) Ensuring access and Internal Security Policy at RC facilities;
 - (l) Formation of reference materials for the internal information support of RC activity, production branches and representative offices;
 - (m) Execution of judicial acts as well as acts of other bodies or officials subject to execution in accordance with the Legislation of RC *Registration Country* about enforcement proceedings;
 - (n) Implementation of rights and legitimate interests of RC within the framework of implementation of activities stipulated by the Charter and

- other Local Regulatory Acts of RC, or third parties, or the achievement of socially significant goals;
- (o) Any other legitimate purposes.

6. Principles to be followed while Processing of Personal Data:

The Processing of Personal Data in the RC shall be carried out taking into account as well as paramounting the need to ensure the protection of the Rights to Privacy, personal freedoms as well as privacy of Personal Data Subjects, including protection of their rights to personal and family privacy, based on the following principles, viz. –

- (a) Processing of Personal Data shall be carried out in the RC in a lawful and fair manner;
- (b) Processing of Personal Data shall be limited to the professional works as well as achievement of specific, predetermined and legitimate goals within the parameters of professional works;
- (c) Processing of Personal Data that is incompatible with the purposes of collecting Personal Data as mentioned herein shall not be allowed;
- (d) Database integration which contains Personal Data that are Processed for purposes incompatible with each other shall not be allowed;
- (e) Only that Personal Data which meets the purposes of their Processing, shall be Processed;
- (f) Content and volume of the Processed Personal Data shall be consistent with the specified Processing Objectives. The redundancy of the Processed Personal Data in relation to the stated purposes of their Processing shall not be allowed;
- (g) Processing of Personal Data shall ensure the accuracy of Personal Data, its sufficiency, and if necessary, relevance in relation to the purposes of Processing of Personal Data. RC shall take necessary measures for ensuring their operations or Process to remove or clarify incomplete or inaccurate Personal Data;
- (h) Personal Data shall be stored in the form that allows determining the Personal Data Subjects no longer than the purpose of Processing of Personal Data requires, unless the period for storing Personal Data is prescribed by the Federal Law, or enactments in the *Registration Country* or an Agreement to which the beneficiary or guarantor is Personal Data Subject gives valid prior consent or ratifies it subsequently if need arises;
- (i) The Processed Personal Data shall be De-Personalized or Destroyed upon the achievement of Processing objectives or in the event of the cessation of the need to achieve these objectives, unless otherwise provided by the Federal Law, or enactments in the RC *Registration Country* or an Agreement between RC and the Personal Data Subject/s.

7. List of Subjects whose Personal Data shall be Processed in RC:

RC shall Processes the Personal Data of the following categories of Subjects, viz. –

- (i) RC Executives, Employees as well as Workers &
- (i) other Personal Data Subjects as referred hereinabove with whom RC interacts and transacts,

in order to ensure the implementation of the Processing Objectives specified in the Policy.

8. List & Categories of Personal Data processed in RC:

- (a) The List & Categories of Personal Data being Processed in RC shall be determined in accordance with the objects and requirements of Rosatom in the course of its professional working as enumerated herein, the relevant policies of or Legislations and Enactments of the RC *Registration Country*, Local Regulatory Acts of the State Atomic Energy Corporation Rosatom and the RC, based on the various purposes of Processing Personal Data as specified herein, to be achieved;
- (b) Special categories of Personal Data or some Sensitive Personal Data relating to ethnicity, nationality, political views, religious or philosophical beliefs, Intimate Life, Sex Life, Sexual Orientation, Transgender status, Intersex Status, Caste or Tribe etc. and any other Data of similar sensitive nature shall not be processed in RC.

9. RC functions for Processing of Personal Data:

For Processing Personal Data, RC shall:

- (a) Perform all actions and Processes as required to be done for Processing Personal Data required for its professional working and achievement of various objections of Rosatom, as envisaged under the present Policy;
- (b) Avail of all scientific means to perform Processing of Personal Data for the purposes of the professional and day to day working of Rosatom as enumerated herein;
- (c) Take all necessary and required steps and measures to ensure compliance with the requirements of the Legislation and Enactment of RC *Registration Country* as well as Local Regulatory Acts in relation with Processing of Personal Data;
- (d) Take legal, organizational and technical measures to protect Personal Data from unlawful or accidental access, destruction, alteration, blocking, copying, pilferage, provision, disclosing of Personal Data, as well as from other illegal actions in relation to Personal Data;
- (e) Appoint qualified and experienced person/s who shall be responsible for organizing the Processing of Personal Data in RC and doing all works, operations, functioning etc. in relation to Processing Personal Data;
- (f) Publish Local Regulations defining Policies and issues of Processing and Protection of Personal Data in the RC;
- (g) Carry out familiarization of employees of RC with the direct Processing of Personal Data and also with the relevant provisions of the RC *Registration Country* Legislation, Local Regulations of Rosatom and RC in relation to

Personal Data, including requirements for the protection of Personal Data, and training of its employees;

- (h) Publish or otherwise provide unrestricted access to this Policy;
- (i) Inform the Subjects of Personal Data or their representatives about the availability of Personal Data related to the relevant Subjects in prescribed manner, provide an opportunity to familiarize themselves with the Personal Data while accessing and / or receiving requests from specified Personal Data Subjects or their representatives, unless otherwise provided by the RC *Registration Country* Legislation;
- (j) Stop Processing and destroy Personal Data in cases stipulated by the RC *Registration Country* Legislation in relation to Personal Data;
- (k) Perform all other actions and Processes as stipulated by the RC *Registration Country* Legislation in relation to Personal Data.

10. Conditions for Processing of Personal Data in RC:

- (a) Processing of Personal Data in RC shall be done by duly informing and taking Personal Data Subject into confidence and with his consent for Processing of his Personal Data, unless otherwise for certain important purposes permitted by the RC *Registration Country* Legislation in relation to Personal Data;
- (b) RC shall not without the consent of the Personal Data Subject, disclose to any third party and shall not distribute his Personal Data, unless otherwise required by or provided for by the Federal Legislation and by the RC *Registration Country* Legislation;
- (c) RC shall be entitled to entrust the Processing of Personal Data on contractual basis to any other reliable Operator, as permitted by the RC *Registration Country* Legislation. The contract shall contain a list of actions (operations) that shall be performed on the Personal Data of the Subjects by the concerned Personal Data Operator, and such Operator shall be under an obligation to maintain the confidentiality of Personal Data and for ensuring the safety & security of Personal Data during its Processing, as well as requirements for the protection of Personal Data being processed and stored;
- (d) For the purpose of internal information support, RC may create internal reference materials, which, with the written consent of the Personal Data Subjects, unless otherwise provided by the RC *Registration Country* Legislation, may include their complete name, place of work, position, year and place of birth, address, telephone line number, E-mail, other Personal Data reported by the Personal Data Subject;
- (e) Access to Personal Data processed shall be allowed in RC only to its employees holding positions as included and specified in the list of RC posts, which are replaced when Personal Data are processed.

11. List of actions with Personal Data and methods for its Processing:

- (a) RC collects, records, sorts out, classifies, organizes, stores, refines (updates, changes), retrieves, uses, transfers (distributes, provides, accesses), remodel, blocks, deletes and destroys Personal Data;
- (b) Processing of Personal Data in RC is carried out in the following ways:
 - (i) Manual Processing of Personal Data;

- (ii) Automated Processing of Personal Data with or without transferring the information received through Internet and telecommunication networks &
- (iii) Mixed Processing of Personal Data.

12. Rights of Personal Data Subjects:

The Personal Data Subjects are entitled to:

- (a) Complete & satisfactory information about their Personal Data Processed in RC;
- (b) Access to their Personal Data, including the right to receive a copy of any record containing their Personal Data, except as required to be refrained or dispensed with by the RC *Registration Country* Legislation, as well as access to relevant medical data with the help of a medical specialist of their choice;
- (c) Clarification of their Personal Data, their blocking or destruction if Personal Data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the required purpose of Processing;
- (d) Withdrawal of consent to the Processing of Personal Data;
- (e) Taking measures provided by Law to protect their rights;
- (f) Appeal against acts or omissions of the RC, carried out in violation of the requirements of the RC *Registration Country* Legislation in relation to Personal Data, with the authorized body for protection of the rights of Personal Data Subjects or in Courts, Exercise other rights stipulated by the RC *Registration Country* Legislation etc.

13. Responsibility of Personal Data Subjects & Indemnity and Safety of RC against allegations of misuse of Personal Data:

- (a) RC shall right at inception itself provide general information to the Personal Data Subjects about Processing of their Personal Data, including about the purpose therefor and the basic methodology about the operations, classifications, storage etc.;
- (b) It shall be responsibility of Personal Data Subjects to provide and furnish to RC correct and accurate information about themselves;
- (c) In the event of any Processing or classification or any other related operation going wrong or incorrect or improper owing to incorrect or inaccurate or improper information provided by Personal Data Subject/s to RC, then RC shall not be responsible for their results and no action or claim shall be maintainable in this regards against RC by any Personal Data Subject or any representative on their behalf;
- (d) RC shall information all the Personal Data Subjects about their rights and duties and accordingly it shall be responsibility of all Personal Data Subjects to periodically after every Six months approach persons and employees of RC responsible for Processing Personal Data and have access to their Personal Data being stored and classified in the Personal

Data Processing System of RC, ascertain and confirm their accuracy and if they so desire, also collect a copy thereof;

- (e) Every periodical inspection of the Personal Data by the concerned Personal Data Subject or voluntary non-inspection of the Personal Data by the concerned Personal Data Subject, shall mean and certify that RC has duly Processed the concerned Personal Data and thereafter no claim or allegation shall be entertained against RC for improper or incorrect or any related Breach of Personal Data.

14. Measures taken by RC to ensure the performance of Operator duties for Processing of Personal Data:

The measures that are required & necessary to ensure that RC fulfills the Operator's duties as stipulated by the RC *Registration Country* Legislation in relation to Personal Data include:-

- (a) Appointment of qualified and experienced person/s responsible for organizing of Processing of Personal Data in RC;
- (b) Adoption of Local Regulations and other documents in relation to Processing of Personal Data;
- (c) Organizing of training and conducting methodological work with employees of RC, who occupy positions included in the list of RC posts, during the substitution of which Personal Data is processed obtaining the consent of personal entities i.e. Personal Data Subjects for Processing of their Personal Data, except as exempted by the RC *Registration Country* Legislation;
- (d) Separation of Personal Data processed without the use of Automation, from other information, in particular, by fixing them on separate material carriers of Personal Data, in special sections;
- (e) Provision of separate storage of Personal Data and their material carriers, which are processed for different purposes and which contain different categories of Personal Data;
- (f) Imposing a ban on transfer of Personal Data through open communication channels, computer networks outside the controlled area and the Internet without applying measures to ensure the security & confidentiality of Personal Data (except publicly available and / or depersonalized Personal Data) as established in the RC *Registration Country*;
- (g) Storage of Personal Data material carriers in compliance with conditions that ensure the safety of Personal Data and exclude unauthorized access;
- (h) Internal control over the compliance of Processing of Personal Data with the RC *Registration Country* Legislation, laws and regulations adopted in accordance with it, requirements for the protection of Personal Data, this Policy, Local Regulatory Acts of RC;
- (i) Formulating a working mechanism for keeping vigil on the Personal Data Processing system as well as persons and / or employees of RC, whether or not responsible for Processing of Personal Data, to ensure that there is no Breach of Personal Data in any manner;
- (j) Conducting enquiry and taking strict action against any person and / or employees of RC found involved in any sort of Breach of Personal Data or violation of the present Policy, including giving prompt information to the

concerned Law Enforcing Agencies as provided under RC *Registration Country* Legislation or general law enforcing or policing agency as may be required under the given set of circumstances;

- (k) Other measures stipulated by the *RC Registration Country* Legislation in relation to Personal Data;
- (l) Measures to ensure the security of Personal Data when it is processed in Personal Data Information systems are established in accordance with the industry requirements of the Legislation of *RC Registration Country* in relation to Personal Data.

15. Control of compliance with the Legislation of *RC Registration Country* and Local Regulatory Acts of RC in relation to Personal Data, including requirements for protection of Personal Data:

- (a) Monitoring of compliance by employees of RC with *RC Registration Country* Legislation and Local Regulatory Acts of RC in relation to Personal Data, including requirements for the protection of Personal Data, shall be regularly carried out to verify compliance of Processing of Personal Data in RC with the *RC Registration Country* Legislation and Local Regulatory Acts of the RC in relation to Personal Data, including requirements for the protection of Personal Data, as well as the adoption of measures aimed at detecting and thereby preventing violations of the Legislation of the *RC Registration Country* in relation to Personal Data, identifying possible channels of leakages, pilferages and unauthorized access to Personal Data, eliminating the consequences of such violations;
- (b) Internal control over the compliance by RC employees with the Legislation of the *RC Registration Country* and Local Regulatory Acts of RC in relation to Personal Data, including requirements for the protection of Personal Data, shall be carried out by the person/s responsible for organizing the Processing of Personal Data in RC;
- (c) Internal control over the compliance of Processing of Personal Data with the *RC Registration Country* and regulations adopted in accordance with it, requirements for the protection of Personal Data, this Policy, Local Regulatory Acts of RC is carried out by the Asset Protection and Corporate Security Department of the Rosatom International Network private institution;
- (d) Personal responsibility for compliance with the laws of *RC Registration Country* and Local Regulatory Acts of RC in relation to Personal Data in RC, as well as for ensuring the confidentiality and security of Personal Data in RC, rests with the head of the RC.

16. Normative references:

While adopting the present Policy to the requirements of the *RC Registration Country* National Legislation, this section contains references to some of the relevant Legislative and Regulatory acts of *RC Registration Country* in relation to Personal Data as well as other related Personal Data Protection policies being followed world over, viz. –

- (i) The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, as prescribed under Section 43A of the Information Technology Act, 2000 of India;
- (ii) The Personal Data Protection Bill, 2018 of India;
- (iii) The Data Protection Committee's Report of India (released on 27 July 2018)
- (iv) European Union – General Data Protection Regulation (GDPR) etc.

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